IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

STATE FARM FIRE AND CASUALTY COMPANY a/s/o Robert Roehm and

Patricia Roehm

Plaintiff, : C.A. No. 02-CV-4019

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:

ELECTROLUX and LOWE'S HOME

v.

CENTERS, INC. : JURY TRIAL DEMANDED

Defendant.

PLAINTIFF STATE FARM FIRE & CASUALTY COMPANY'S MOTION TO COMPEL DEFENDANT ELECTROLUX TO ANSWER TO DISCOVERY AND MOTION FOR ASSESSMENT OF ATTORNEY'S FEES

COMES NOW PLAINTIFF, and pursuant to Federal Rules of Civil Procedure 37, files its Motion to Compel Defendant Electrolux to answer discovery, and its Motion for Assessment of Attorneys Fees. The specific grounds for Plaintiff's Motions are more fully set forth in the attached Memorandum of Law.

FREY, PETRAKIS, DEEB, BLUM, BRIGGS & MITTS, P.C.

By:			
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STEPHEN J. ALEXANDER, ESQUIRE 1601 Market Street, 6th Floor Philadelphia, PA 19103 (215) 563-0500

Attorney for Plaintiff State Farm Fire & Casualty Company